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Via ECF

The Honorable Joel Schneider
United States Magistrate Judge
District of New Jersey

Re: *In re Valsartan Products Liability Litigation*, MDL No. 2875 (RBK/JS)

Dear Judge Schneider:

I write to provide the Court with an update on behalf of Defendants Torrent Pharmaceuticals, Ltd. and Torrent Pharma, Inc.'s (collectively, "Torrent") discussions with Plaintiffs' counsel regarding the Motion to Modify ESI Search Terms.

On June 9, 2020, I wrote to Plaintiffs' counsel addressing Torrent's positions on the Motion and offered to meet and confer. Ex. A. Counsel for the parties then had a productive meet and confer discussion, during which the parties agreed to evaluate problematic search terms and Torrent agreed to begin reviewing documents that hit on non-problematic search terms while the parties continue to meet and confer. (Dkt. 328).

Torrent is confident the parties will be able to reach an agreement to refine and narrow the search terms as necessary in order to reduce unnecessary efforts and cost.

Sincerely,

/s/ Alexia R. Brancato

Alexia R. Brancato

KIRKLAND & ELLIS LLP

Enclosure

Cc: Adam Slater, Esq. (via email, for distribution to Plaintiffs' Counsel)
Seth A. Goldberg (via email, for distribution to Defendants' Counsel)
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